

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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21 MC 102 (AKH)

IN RE: LOWER MANHATTAN DISASTER SITE  
LITIGATION

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CHRISTHIAN TAPIA, :  
 :  
 : 08-CV-2248 (AKH)

Plaintiff, :  
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 :

-against- :  
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2 BROADWAY LLC, 37 BENEFITS FUND : **FGP 90 WEST STREET,**  
TRUST, 4101 AUSTIN BLVD CORPORATIO : **INC.'S NOTICE OF**  
WATER STREET CONDOMINIUM, 63 WALL : **ADOPTION OF ANSWER TO**  
STREET INC, 63 WALL, INC., ALAN KASMAN : **MASTER COMPLAINT**  
DBA KASCO, AMBIENT GROUP, INC., :  
AMERICAN EXPRESS BANK, LTD, AMERICAN :  
EXPRESS COMPANY, AMERICAN EXPRESS :  
TRAVEL RELATED SERVICES COMPANY, :  
INC., ANN TAYLOR STORES CORPORATION, :  
BANKERS TRUST COMPANY, BANKERS :  
TRUST CORP., BANKERS TRUST NEW YO RK :  
CORPORATION, BATTERY PARK CITY :  
AUTHORITY, BFP TOWER C CO. LLC, BFP :  
TOWER C MM LLC, BLACKMON-MOORING- :  
STEAMATIC CATASTOPHE, INC. D/B/A BMS :  
CAT, BROOKFIELD FINANCIAL PROPERTIES, :  
INC., BROOKFIELD FINANCIAL PROPERTIES, :  
LP, BROOKFIELD PARTNERS, LP, :  
BROOKFIELD PROPERTIES CORPORATION, :  
BROOKFIELD PROPERTIES HOLDINGS INC., :  
BROWN BROTHERS HARRIMAN & CO., INC., :  
COLLIERS ABR INC, DEUTSCHE BANK TRUST :  
COMPANY AMERICAS, DEUTSCHE BANK :  
TRUST CORPORATION, ELAINE ESPEUT, AS :  
TRUSTEE UNDER A DECLARATION OF :  
TRUST, ENVIROTECH CLEAN AIR, INC., FGP :  
90 WEST STREET INC., FRANK MORELLI, AS :  
TRUSTEE UNDER A DECLARATION OF :  
TRUST, GPS ENVIRONMENTAL :  
CONSULTANTS, INC., HILLMAN :

ENVIRONMENTAL GROUP, LLC, INDOOR :  
 ENVIRONMENTAL TECHNOLOGY, INC., J.P. :  
 MORGAN CHASE CORPORATION, JONES :  
 LANG LASALLE AMERICAS, INC., JONES :  
 LANG LASALLE SERVICES, INC., KASCO :  
 RESTORATION SERVICES CO., KIBEL :  
 COMPANIES, LEHMAN BROTHERS :  
 HOLDINGS INC., LEHMAN BROTHERS, INC., :  
 LEHMAN COMMERCIAL PAPER, INC., i :  
 MANUFACTURERS HANOVER TRUST I :  
 COMPANY, MERRILL LYNCH & CO, INC, :  
 \NEW WATER STREET CORP., NOMURA :  
 HOLDING AMERICA, INC., NOMURA :  
 SECURITIES INTERNATIONAL, INC., ONE :  
 WALL STREET HOLDINGS, LLC, STRUCTURE :  
 TONE (UK), INC., STRUCTURE TONE GLOBAL :  
 SERVICES, INC., THE BANK OF NEW YORK :  
 COMPANY, INC., TISHMAN INTERIORS :  
 CORPORATION, TISHMAN SPEYER :  
 PROPERTIES, TOSCORP INC., TRAMMELL :  
 CROW COMPANY, TRAMMELL CROW :  
 CORPORATE SERVICES, INC., TUCKER :  
 ANTHONY, INC., V CUCINIELLO, WESTON :  
 SOLUTIONS, INC., WFP RETAIL CO. G.P. :  
 CORP., WFP RETAIL CO. L.P., WFP TOWER A :  
 CO., WFP TOWER A CO. G.P. CORP., WFP :  
 TOWER A. CO., L.P., WFP TOWER B CO. G.P. :  
 CORP., WFP TOWER B HOLDING CO., LP, :  
 WFP TOWER B. CO., L.P., WFP TOWER D CO. :  
 G.P. CORP., WFP TOWER D HOLDING V CO. I :  
 L.P., WFP TOWER D HOLDING CO. II L.P., WFP :  
 TOWER D HOLDING I G.P. CORP., AND WFP :  
 TOWER D. CO., L.P., ET AL :  
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 Defendants. :  
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PLEASE TAKE NOTICE THAT Defendant FGP 90 West Street, Inc., by its attorneys,  
 DLA Piper US LLP, as and for its responses to the allegations set forth in the Complaint by  
 Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced  
 action, hereby adopts FGP 90 West Street, Inc.'s Answer to Master Complaint dated August 3,

2007, which was filed in the matter *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). To the extent that FGP 90 West Street, Inc.'s Answer to the Master Complaint does not comprehensively address any of the allegations set forth in the Check-Off Complaint filed in the above-captioned matter, FGP 90 West Street, Inc. denies knowledge or information sufficient to form a belief as to the truth of such allegations.

WHEREFORE, FGP 90 West Street, Inc. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York.  
July 28, 2008

By: s/ Keara M. Gordon

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